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Attorneys for Plaintiff Water Street Gaming LLC

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

WATER STREET GAMING LLC, d/b/a
Rainbow Club.

Plaintiff,

v.

CULINARY WORKERS UNION
LOCAL 226,

Defendant.

Case No. 2:24-cv-00297

**STIPULATION FOR EXTENSION
OF TIME FOR DEFENDANT TO
RESPOND TO THE COMPLAINT
PURSUANT TO CIVIL LOCAL
RULE IA 6-1(a)**

(First Request)

Plaintiff Water Street Gaming LLC d/b/a Rainbow Club ("Rainbow Club") and Defendant
Culinary Workers Union Local 226 ("Local 226"), by and through their respective attorneys of

record herein, and without waiving any rights, claims, or defenses they have in this action, enter into this Stipulation pursuant to Civil Local Rule 6-1(a) as follows:

WHEREAS, Rainbow Club filed its Amended Complaint on February 13, 2024, ECF No. 2;

WHEREAS, on February 16, 2024, Rainbow Club served its Amended Complaint;

WHEREAS, absent an extension, Local 226's deadline to answer the Amended Complaint is March 8, 2024, under Federal Rule of Civil Procedure 12(a)(1)(i);

WHEREAS, the Parties have met and conferred and agreed to explore whether they might be able to resolve the case without the need for further Court involvement;

WHEREAS, Plaintiffs have agreed to give Defendant an extension of time to respond to the Complaint up to and including April 5, 2024;

WHEREAS, the Parties believe that these circumstances constitute good cause for granting an extension of time to respond because it will conserve judicial and party resources if the Parties can resolve the case without further Court involvement;

WHEREAS, such an extension will not alter any event or deadline already fixed by Court order.

NOW, THEREFORE, the Parties, through their undersigned counsel, hereby stipulate that Local 226 will respond to the Amended Complaint on or before April 5, 2024.

IT IS SO STIPULATED.

MCCRACKEN, STEMERMAN &
HOLSBERRY, LLP

SIMONS HALL JOHNSTON PC

By: /s/Sarah Grossman-Swenson

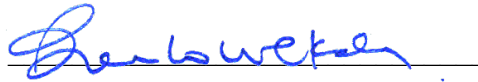
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IT IS SO ORDERED:

Dated: 3/8/2024

A handwritten signature in blue ink, appearing to read "Ben B. Weber", is written over a horizontal line.

PROOF OF SERVICE

I hereby certify that on the 7th Day of March, 2024, I served a true and correct copy of the foregoing document:

**STIPULATION FOR EXTENSION OF TIME FOR DEFENDANT TO
RESPOND TO THE COMPLAINT PURSUANT TO CIVIL LOCAL RULE
IA 6-1(a) (First Request)**

Via electronic filing and electronic mail, addressed as follows:

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Attorneys for Plaintiff

I declare under penalty of perjury that the foregoing is true and correct.

/s/Katherine Pierre
Katherine Pierre